

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
NICOLE DONNETTE STEELEY	)	Case No. 19-34628-KRH
	)	Chapter 13
Debtor	)	

**MOTION TO INCUR DEBT**

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on September 05, 2019.
2. The Debtor has applied for and Movement Mortgage, LLC has approved a loan to the Debtor in the amount of \$311,258.00 plus interest at 2.625% per annum to be repaid with 360 equal monthly payments of approximately \$1,250.17 for principal, interest, and escrow for the purchase of a home located at 10406 Brynmore Drive, North Chesterfield, Virginia 23237. The closing costs are to be paid by the Debtor's spouse and mother-in-law.
3. The purchase price of the Property is \$317,000.
4. There will be no loan proceeds payable to the Debtor.
5. The purchase of the Property is in the best interest of the Debtor and will facilitate the Debtor's ability to perform under her Chapter 13 Plan filed herein.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

6. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

NICOLE DONNETTE STEELEY

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane  
James E. Kane

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**NOTICE OF MOTION AND HEARING**

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **October 20, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

- **REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the "Zoom Request Form"), which is available on the Court's internet website at [www.vaeb.courts.gov](http://www.vaeb.courts.gov), on the page titled, "Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information." Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

\*\*\*The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge's attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

**\*\*\* PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: October 18, 2021

NICOLE DONNETTE STEELEY

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
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Richmond, VA 23219  
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/s/ James E. Kane

James E. Kane

Alfredo Sunga  
c/o JFB Management  
410 N. Ridge Rd. Suite 100  
Henrico, VA 23229

Ballato Law Firm  
3721 Westerre Parkway  
Suite A  
Henrico, VA 23233

Bank of America  
Attn: Bankruptcy  
P.O. 982284  
El Paso, TX 79998

Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Capital One Auto Finance  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Carmel Holding Co  
10660 Argonne Dr.  
Glen Allen, VA 23060

Check Into Cash  
3059 Mechanicsville Tnpk  
Richmond, VA 23223

City of Richmond  
Parking Tickets  
P.O. Box 26508  
Richmond, VA 23261

City of Richmond  
900 E Broad Street  
Room 109 Delinquent Taxes  
Richmond, VA 23219

CJW Medical Center  
PO Box 99400  
Louisville, KY 40269

Continental Finance Company  
Attn: Bankruptcy  
Po Box 8099  
Newark, DE 19714

Credit Acceptance  
25505 W. Twelve Mile Rd  
Ste. 3000  
Southfield, MI 48034

Emergency Coverage Corp.  
c/o ARS  
PO Box 8668  
Coral Springs, FL 33075-8668

Express Lanes  
PO Box 28148  
New York, NY 10087

First Premier Bank  
Attn: Bankruptcy  
Po Box 5524  
Sioux Falls, SD 57117

Focused Recovery Solutions  
9701-Metropolitan Ct  
Ste B  
North Chesterfield, VA 23236

Genesis Bc/celtic Bank  
Attn: Bankruptcy  
268 South State Street Ste 300  
Salt Lake City, UT 84111

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101

Mariner Finance  
13102 Midlothian Tnpk.  
Midlothian, VA 23113

Maryland Transportation Auth.  
PO Box 17600  
Baltimore, MD 21297

NetCredit  
175 W. Jackson Blvd., Suite 1000  
Chicago, IL 60604

New York State Dept of Tax  
NYS Assesment Receivables  
P.O. Box 4127  
Binghamton, NY 13902

NYC Housing Authority  
250 Broadway, 9th Floor  
New York, NY 10007

PayPal  
PO Box 105658  
Atlanta, GA 30348-5658

Paypal  
ATTN BANKRUPTCY  
Po Box 45950  
Omaha, NE 68145

Plaza Services, Llc  
Attn: Bankruptcy  
110 Hammond Dr. Ste 110  
Atlanta, GA 30328

Professional Account Mgmt  
386 Pickett St  
PO Box 22147  
Alexandria, VA 22304

Radiology Assoc of Richmond  
PO Box 13343  
Richmond, VA 23225

Receivables Management Systems  
PO Box 17305  
Richmond, VA 23226

Shawn C. Tuthill  
c/o Liberty Homes Inc  
8249 Crown Colony Parkway A  
Mechanicsville, VA 23116



Square Inc.  
1455 Market St.  
Suite 600  
San Francisco, CA 94103

The Port Authority  
PO Box 15183  
Albany, NY 12212

Violations Processing Center  
EZ-Pass NY  
P.O. Box 15186  
Albany, NY 12212

Virginia Dept. of Taxation  
P O Box 2156  
Richmond, VA 23218

Wells Fargo Dealer Services  
Attn: Bankruptcy  
Po Box 19657  
Irvine, CA 92623